

IN THE UNITED STATES DISTRICT COURT FOR EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

IN RE DRAKE-STUDY

4:1700874

U.S. EX REL. LIU vs. ALLEN, DATAPROSE, COLLIN, MORGAN CROSSING, ASSURED MANAGEMENT;

COMPLAINT PUBLIC CORRUPTION



PARTY OF INTEREST STATEMENT [FRCP RULES, RULE-17]

- (a)(1) This action is hereby prosecuted upon United States interest, while officer Mr. Hao Liu whom had been prosecuting its proceeding pending before Congress pursuant ART.III, Section 1, whether its circuit judges (Garland, Henderson, Rogers, Tatel, Brown, Griffith, Kavanaugh, Srinivasan, Millett, Pillard, and Wilkins) behave properly at time national importance of question if its circuit compliance United States Courts Judicial Conference mandate judicial standard. Then much the hostiles obstruction, threat, retaliation was filed at district court (See, e.g., USDC-EDTX-416CV694 & 417CV263).
- (b) Then Mr. Liu had to relocate his mother (Mrs. Liu) to of his post studies or domicile "Drake-Study" allocated at "1811 Drake Dr., Allen, Texas 75002, Collin County" whereat Mr. Liu and his mother own 100% of the property. So that party Mr. Liu and his mother (Mrs. Liu) collectively "Liu" and "Drake-Study" property is real and party of interest.
- (c) There is no minor or incompetent person; and,

(d). Officers naming compliance mandate its title, "Liu".

Hao Liu for the United States, dated 12/18/2017

<u>i</u>

TABLE OF CONTENT

I.	UNITED STATES INTEREST	
		1
	With subdivision alleged event combined factual or predicate act setforth enumerate alphabetical following:	
	(A). WEIRD DISCLOSURE	2
		2
	(B). TRANSMISSIONS OF SCHEME	
	(C). WIRED FRAUD	5
		6
	(D). AD VALOREM	
		10
	(E). MISREPRESENTATION PROPERTY CODE SEC.11.45	
		11
	(F) . EXTORTION UNDER COLOR OF OFFICIAL RIGHT	
		13
	(G). INTERFERENCE PROPERTY	
	·	14

ii

	(H). RECKLESS E	NDANGERMEN'I'	
			18
	(I). RETALIATING	G, INTIMIDATION & THREAT	
			20
	(J). COLLECTION	UNLAWFUL DEBT	22
II.	DEFENDANTS		23
III	VENUE & JURISDI	CTION	
			24
	COUNT-1		24
	COUNT-2		25
	COUNT-3		25
	COUNT-4		25
	COUNT-5		25
	COUNT-6		26
	COUNT-7		26
	COUNT-8		26
	COUNT-9		27

iii

	COUNT-10		••••	27	
	COUNT-11			27	
	COUNT-12			28	
	COUNT-13			28	
IV.	TREBLE RELIEF			28	
V.	JOINDER NOMINAL	DEFENDANTS		29	
VI.	CONCLUSION			29	
VII.	ATTACHMENT-1 EXHIBIT-ALLEN-D	ISCLOSURE			
VIII.	ATTACHMENT-2 EXHIBIT- CCAD -MAIL#834				
IX.	ATTACHMENT-3 EXHIBIT-CCAD-RE	CEIVING			
х.	ATTACHMENT-4				

EXHIBIT-NOTICE OBSTRUCTION

iv

City-of-Allen, USPS#70153010000056570495;

Collin-County, USPS#70153010000056570501;

Morgan Crossing Owners Association, USPS#70153010000056570488

XI. ATTACHMENT-5

EXHIBIT-MORGAN CROSSING-001 EXHIBIT-MORGAN CROSSING-002

XII. ATTACHMENT-6

EXHIBIT-CODE-545.303(b)-VIOLATION-001

EXHIBIT-CODE-545.303(b)-VIOLATION-002

-SEALED-

EXHIBIT-CODE-545.303(b)-VIOLATION-003

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<u>IN RE DRAKE-STUDY</u> [COMPLAIN PUBLIC CORRUPTION]

I. UNITED STATES INTEREST

1. First Congress enact several statutes against corruption since 1789 that disqualification its custom officers from office, which known as the judicial bribery provision of the *Crimes Act of 1790* also the mail fraud statute address public corruption was enacted in 1872 provides intangible right to honest government.¹

2. Article II, Section-4 prosecute provision high crimes and misdemeanors common law corruption obligation by Article IV, Section-4 guarantee every state in this union a Republic form of government. This obligated "Republic"² is form government in which the administration affairs is open to all its citizens public interest.³ Congress then had further empowered district court primary obligatory enforcement its enactment civil regulatory including state created civil rights obligations specified two(2) acts the Securities Act and Social Security Act which acts together in parallel mandatory standard review by generally accepted accounting principles known as GAAP in uniform minimum standardization guideline regulatory entities and local state government operation in transparency.

¹ See, e.g., US vs. States, 488 F.2d 761 (8th Cir. 1973).

² See, e.g., Black's Law, west publishing co. 4th edition, 1968.

³ Federalist Number 10.

With subdivision alleged event combined factual or predicate act setforth enumerate alphabetical following:

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(A). WEIRD DISCLOSURE

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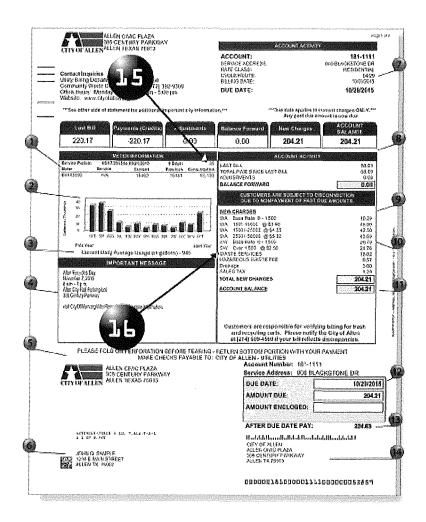
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3. Generally Accepted Accounting Principles (GAAP) are specific rules for the state and its local government financial transparency statements disclosures, that refers as cost to obtain or acquire asset of revenue must be reported as accrual accounting that holds the expense matching the revenue for its disclosure transport or known as Cost, Revenue, Matching, Disclosure four(4) standard basic principles. "City-of-Allen" utility billing disclosure contains statement of combined component consists 1-14 (See, e.g., EXHIBIT-ALLEN-DISCLOSURE, https://www.cityofallen.org/DocumentCenter/Home/View/247):

- 1. Meter Activity.
- 19 | 2. Usage History Graph.
- 20 | 3. Average Daily Usage.
- 21 4. Special Messages.
- 22 | 5. Payment Coupon (Tab).
- 23 6. Customer Name and Mailing Address.
- 24 7. Account Information.
- 25 8. account Activity.
- 26 | 9. Current Charges.
- 27 | 10. Itemized Charges.
- 28 | 11. Total Due.
- 29 | 12. Due Date.
- 30 | 13. *Late Fee.*
- 31 | 14. Remit Address.



[EXHIBIT-ALLEN-DISCLOSURE ITEM-15,16]

4. As in reference Generally Accepted Accounting Principles (GAAP) anatomy which Full Disclosure Principle mandate Matching principle compliance, that "City-of-Allen" utility bill or invoiced "Billing-Cycles" each duration length-in-day asymmetry does not match cities collection revenue period-in-day earnings in symmetry. Notice "Drake-Study" billed by the "City-of-Allen" irregularity of billing cycles with its regular charged trash service below:

TABLE-1: 2017 IRREGULARITY-BILLING-CYCLES

BILLING CYCLE	PERIOD	DURATION (DAYS)	TRASH SERVICE
1	JAN-FEB		
2	FEB-MAR		
3	MAR-APR	29	\$15.02
4	APR-MAY	35	\$15.02
5	JUN-JUL	30	\$15.02
6	JUL-AUG	34	\$15.02
7	AUG-SEP	27	\$15.02
8	SEP-OCT	30	\$15.02
9	OCT-NOV	33	\$15.02
10	NOV-DEC	29	\$15.02

[EXHIBIT-DRAKE STUDY-WATER BILL RECORD]

This irregularity "Billing-Cycles" asymmetry length disruptive public mental burdens of receiving-to-paying "City-of-Allen" water billing statement regularity patterned monthly routine date.

5. Additionally in reference *Generally Accepted Accounting Principles* (GAAP) anatomy that *Full Disclosure Principle* mandate adjustment information affects its formulation symmetry earning period-in-days to collecting its revenue from aforementioned irregular "*Billing-Cycles*" asymmetry length-in-days, there is none (*See*, e.g., TABLE-1 *Irregularity Billing Cycles*, EXHIBIT-DRAKE STUDY-WATER BILL RECORD). Therefore, this none standard water bill disclosure or explanation neglect its collection revenue formulation key component "*Billing-Cycles*", which intent is state of mind is deviative evident (*See*, e.g., EXHIBIT-ALLEN-DISCLOSURE, Item-15 "# *Days*").

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7. Subsequent compulsory by impose late charges upon its premeditate irregularity billing "Billing-Cycles", the "City-of-Allen" was able devised to entice public viewing receiving-to-paying due standard general billing to its online billing public service for purpose a monetary gain.

6. Purposeful neglect and to conceal its complete

disclosure of such irregularity "Billing-Cycles" particular

material effect, that psychologically impairs public

chronicle timely receiving-to-paying due standard general

billing regularity each month that substantially induced

sequential charge of late charge in fees, which amount is

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EXHIBIT-ALLEN-DISCLOSURE. Item-13 "Late Fee").

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(C). WIRED FRAUD

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8. The "City-of-Allen" then contracted its associate or third seller "DataProse" (DataProse, LLC) post-transaction online billings statement, document design and software to be able to handle Extended Markup Language (XML) ability to view and approve water bills online for printing and mailing purpose with provided public secured portal and required username,

password and SSL collectively wired access.

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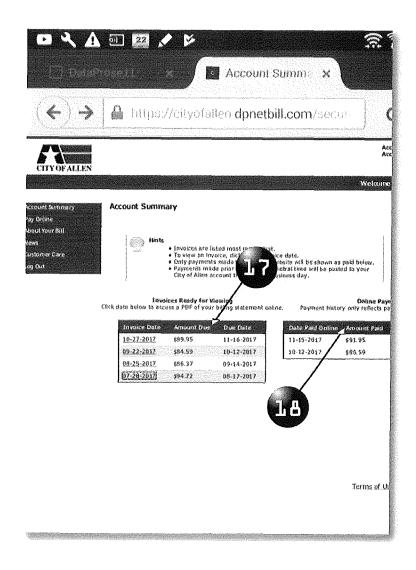
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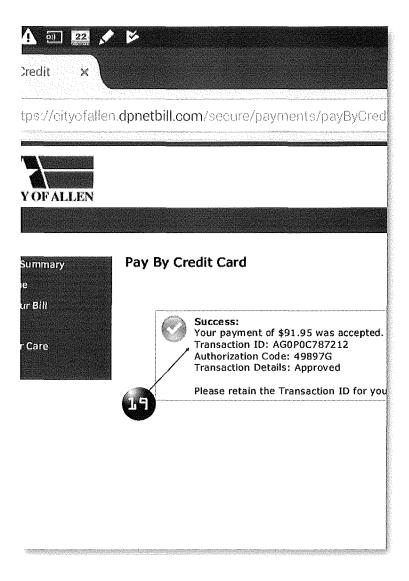
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9. Then this deviative none disclosure practice further extend to its online public service practice. Note "City-of-Allen" actual billed plaintiffs "Drake-Study" utilities invoice dated 09-22-2017 due amount was \$84.59, but in fact online charged was made in the amount \$86.59 on the date 10-12-2017; also, its invoiced date 10-27-2017 the amount \$89.95, which its online charge was made in the amount \$91.95 that differential reveals a pattern its online unauthorized credit card charges that is intention to neglect any clear conspicuously disclosure or any authorization (See, e.g., EXHIBIT-ALLEN-DISCLOSURE. Item-17, Item-18, Item-19). None of "City-of-Allen" or its associate "DataProse" financial statement in disclosures any context at any time procedurally provides public any clear conspicuously or any material terms of such transaction including of any description any goods or services being offered on which differential amount between actual the due-amount and charged-amount made online. This is violation 15 U.S.C. §8402 prohibitions certain unfair and deceptive internet sales practices.



[EXHIBIT-ALLEN-DISCLOSURE ITEM-17,18]



[EXHIBIT-ALLEN-DISCLOSURE ITEM-19]

10. Because contractual material fact agreement between "City-of-Allen" the initial provider and its online post-transaction provider "DataProse" whom must be Payment Card Industry (PCI), including Visa Cardholder Information Security Program (CISP) and MasterCard Site Data Protection (SDP) and whom must submit annually the Statement on Standards of Attestation Engagement (SSAE) including but not limiting its No.16 (SOC1) audit and Federal Trade Commission's Red Flags Rule compliance and mandatory out-of-state disaster recovery support to process the "City-of-Allen" water billings process storage by pretenses, representations, or promises, transmits, or causes to be transmitted by this meaning wiring interstate.

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11. Based on paragraph#3 through #10 specified pattern "City-of-Allen" misrepresentation its irregularity design "Billing-Cycles" antecedence by scheme deliberate-deception-intent causing public chronic payment chaotic anxietied burden imposition late fees amount-due transmitting to entice the nondisclosured differential amount-charged each post-transaction by its contracted third party seller "DataProse, LLC" online charge for the purposeful substantial monetary gain. This scheme process in false transaction by fraudulent pretense public service, this is fraud.

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12. Regardless the above paragraphs entirely, that specified pattern the "City-of-Allen" irregularity "Billing-Cycles" base combined its "Trash Service" (See, e.g., EXHIBIT-ALLEN-DISCLOSURE. Item-16 "CWD Waste Service" "\$15.02" monthly charge), there is none.

(D). AD VALOREM

13. Congress established the Securities Exchange Commission (SEC) an independent agency enforcement regulations of standard Securities Act of 1933 but also provided pubic by approval the Social Security Act that ensures aged retirees and unemployment compensation or benefit the social safety to prevent financial catastrophe in vulnerable families. The Social Security Act subsequent had important impact reformed housing industry uniform national appraisal standard and simplified mortgage process of construction criteria oversight by the Federal Housing Administration (FHA).

14. Texas State legislation had recognized and approval applicable federal ad valorem benefit exemption from its property taxation (<u>See</u>, e.g., TEXAS PROPERTY TAX CODE, Sec.11.12.) since about 1979 and subsequent specifically establishment retirees benefit, or residence homestead codified by its property statute Sec.11.13. with general criteria property owners aged over-65 exemption at time its applications.

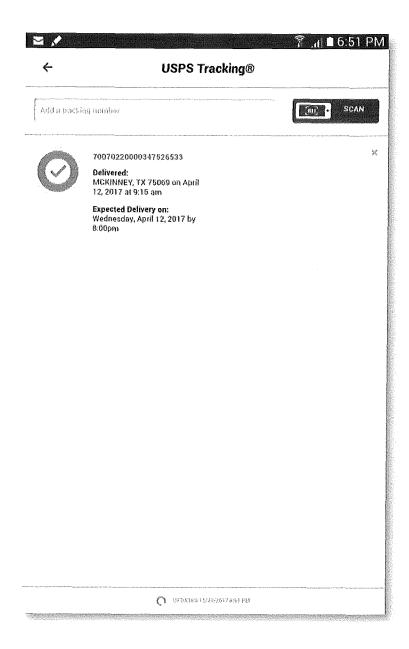
15. On or about 03-05-2017, that because undersigned officer Mr. Hao Liu and his mother Mrs. Liu (Ya-Qin Zhong) aged at 79 whom had made specific clear declaration during closing title transaction "*Drake-Study*" to be used as primary residence, and application for its applicable residence homestead exemption was filled with the *Collin County Appraisal District* complete and proper.

(E). MISREPRESENTATION PROPERTY CODE SEC.11.45

16. On or about 06-20-2017, undersigned officer had been receiving notification Collin County Appraisal District denied "Drake-Study" General Residential Homestead Exemption entitlement application on the futileness ground as "Our office sent you a letter on 04-19-2017 requesting additional information in order to complete the processing of your application. As of this date we have not received that information. According to the Texas Property Tax Code, Section.11.45(b), If the chief appraiser requests additional information from an applicant, the applicant must furnish it within thirty (30) days after the date of the request or the application is denied.", which is absolute fictitious (See, e.g., Attachment-2, EXHIBIT- CCAD -MAIL#834).

17. Evidence shown *Collin County Appraisal District* intending to establish false or fraudulent pretense materially fact, that property owners whom had failed response to its respectful 04-19-2017 letter and threat by intimidation property owners must timely be submissive additional information or whatever it request.

18. Reallege paragraph#15 fact, that contrary claimed by denial as of the date was not receiving information despite of the *Collin County Appraisal District* on 04-12-2017 had in fact receiving property owners timely respectfully response its inquires due corrections and information via US Certified Mail#70070220000347526533 (*See*, e.g., EXHIBIT-CCAD-RECEIVING).



[EXHIBIT-CCAD-RECEIVING, USPS#70070220000347526533]

19. At time the *Collin County Appraisal District* devise its artifice letter dated 06-20-2017 by falsifying and or fraudulent pretense not receiving property owners information, whom in fact had receiving all information consist property "*Drake-Study*" owner Mr. Hao Liu driver license copy shown his primary address in caring co-owner his mother whom is aged 79 years old never had Texas Drivers License so that enclosure a copy of her valid *Social Security Identification Card* by best proof aged retirees addressee intent receiving management her social security benefit at allocation "*Drake Studies*" is appropriate (*See*, e.g., Attachment-2, EXHIBIT- CCAD-RECEIVING).

(F). EXTORTION UNDER COLOR OF OFFICIAL RIGHT

20. Based on paragraph#15 through #19 alleged pattern in fact, which appeared the *Collin County Appraisal District* whom further had been attempting to obtaining certain amount of "additional information" other than *Texas Property Tax Code* Sec.11.13 induced by wrongful use of an actual or threat or fear under color of its official right for the exchanging to process homestead exemption entitlement is the *Hobbs Act* or title 18 U.S.C. § 1951 prohibited extortions.

 21. Reallege specifically paragraph#16, the *Collin County Appraisal District* whom have misrepresentation Texas Property Code, Section 11.45(b) knowingly intentionally recklessly by neglecting portion its statute "However, for good cause shown the chief appraiser may extend the deadline". This evident intent neglect is implication state of mind.

(G). INTERFERENCE PROPERTY

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22. Undersigned officers "Drake-Study" architectural front porch entrance attachment designed being sit affirms direct access to the appurtenant servitudes "Drake-Drive" street curb by means access easement of its right-of-way which street is bi-directional traffic street suited residential access each-side designated residence. Beginning March and April 2017 at time moving-in the properties, that plaintiff observed certain unlawful act imposes a burden on the plaintiffs property adversely risk affection to delay its complete accessing-to-caring enjoyment property. The nuisance including but not limiting alleged neighboring properties owners wrongfully assuming the dominion to the "Drake-Study" attachment right-of-way denial of and or inconsistent United States officers the rightful access his "Drake-Study" by means repeat-to-relapse occasions park unauthorized vehicle and the curb "Drake-Study" or vehicles at constitute impede-to-delay plaintiffs entrance of complete accessing-to-caring enjoyment the property.

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23. On 06-30-2017 while the alleged pattern nuisance repeat-to-relapses persist without improvement, so that plaintiff had made service call to the "City-of-Allen" police request assistance for timely access due to the above nuisance had been jeopardizing plaintiffs yard work and landscape servicing collectively accessing-to-caring enjoyment the property at that time (See, e.g., EXHIBIT-ALLEN-POLICE REPORT#17-039330).

24. Upon arriving "City-of-Allen" police officer (Badge#4377) at scene whom did observe by confirm the above pattern evidence on record vehicle blocking-to-obstruction substantial interference with possession or the right thereto plaintiffs accessing-to-caring enjoyment the property his "Drake-Study".

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25. Reconsolidate paragraph#22 through #24 repeat-to-relapses persist the above pattern substantial interference delay plaintiffs timely accessing-using-caring enjoyment the property, which had intruded plaintiffs expense lot attached regular scheduled maintaining "Drake-Study" specifically trees-plants-shrubs yard work manicure well-being groom quality required accumulative in time maintenance. This evident of event specifically impede-to-delay plaintiffs yard neatly manicured, groomed was noted to the police officer (Badge#4377) on the date 07-07-2017 due to the fact that officers decision (48) forty-eight hours or two(2) days removal or tow subject obstruction vehicle on the date 06-30-2017 (See, e.g., ATTACHMENT-3, EXHIBIT-ALLEN-POLICE REPORT, Notice obstruction Homeowner Access Property & Belated its Servicing, USPS#70153010000056570464).

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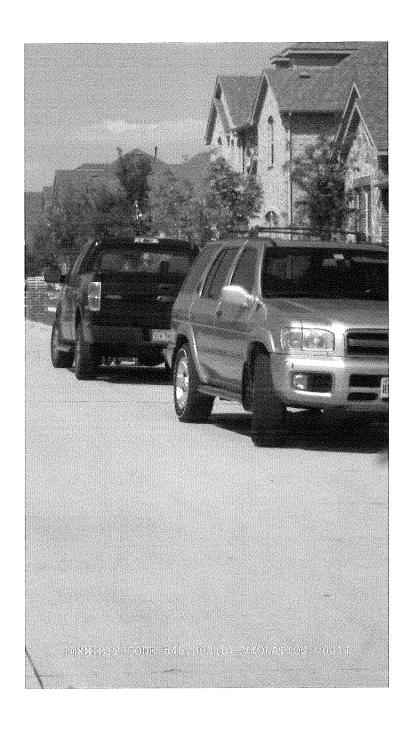
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26. Consolidate paragraph#22 through #25 repeat-to-relapses persist the above pattern substantial interference delay plaintiffs timely accessing-using-caring enjoyment the property, which had impede-to-delay plaintiffs expense lot attached regular scheduled maintaining "Drake-Study" specifically trees-plants-shrubs quality care result healthy in time accumulative growth.





(H). RECKLESS ENDANGERMENT

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27. Base on paragraph#22, #23 repeat-to-relapses persist the above pattern not only substantial interference delay plaintiffs timely accessing-using-caring enjoyment the property the above, which pattern is *Texas Traffic Code* defined "*Parking-Facing-Traffic*" reckless endangerment public safety code 545.303(b) specifically prohibited.

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28. On the 08-07-2017 while the alleged pattern nuisance repeat-to-relapses persist without improvement rather aggravated to reckless endangerment public safety, undersigned United States officer had respectfully notified each alleged due diligent (*See*, e.g., ATTACHMENT-4, *City-of-Allen*, USPS#70153010000056570495; *Collin-County*, USPS#70153010000056570501; *Morgan Crossing Owners Association*, USPS#70153010000056570488).

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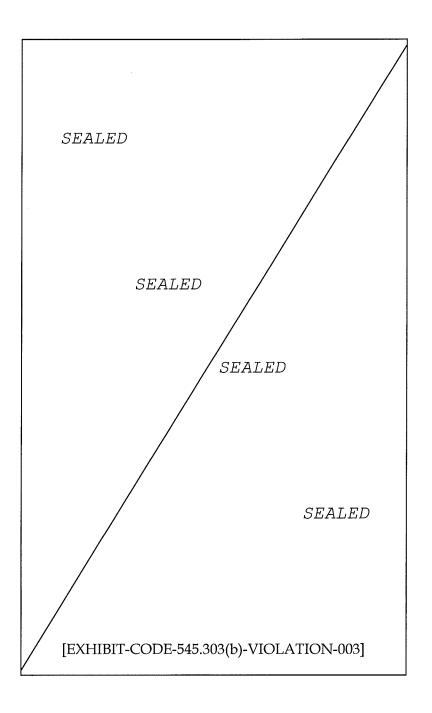
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29. Consolidate paragraph#22 through #28 that despite of United States officers diligent repeat effort to respectful notifying all parties each violation the above, which served no avail. Court should note alleged violations actual photo evidence shown the above page-16 record presents EXHIBIT-CODE-545.303(b)-VIOLATION-001, and page-17 EXHIBIT-CODE-545.303(b)-VIOLATION-002 have shown vehicles "Parking-Facing-Traffic" at scene, which hazardous nuisance pose an imminent injurious to the incoming traffic and or the unapparent element the EXHIBIT-CODE-545.303(b)-VIOLATION-003 record evidence shown behind this parked page vehicle.



(I). RETALIATING, INTIMIDATION & THREAT

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30. Prior and or after 08-30-2017 that undersigned United States officer had been reasonable given all alleged notice due diligent certain applicable statute required time length, that since then plaintiffs had been observed evidence trespass to land disposition trash and its enlarged animal or dog waste being appeared intent deposit-to-display to the "Drake-Study" attachment flowerbed-yard-sidewalk repeat-to-relapses persist multiple occasions. Dog waste naming alleged this complaint meaning evidence solid feces remain digestion excrement certain length intestine and or emissions of concentration liquefied urine vaporizations ammonia uric acid nitrogenous compound strong distinctive hormones odor extend time duration. As result certain dog urination infects nurture-to-prone bacterial growth evident dog-pee-mushroom fungi can be traced "Drake-Study" immediate attached flowerbed.

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31. Despite of "City-of-Allen" fraudulent the above and or with intent to neglect regularly its charged, collected but failed provide any its trash service, that undersigned United States officer had been respectfully excised his due diligent management any "Drake-Study" waste other than its time in reference federal rules prescribed by the United States General Service Administration (GSA) specified real property policy assignment and authorization allocation of space without charge to Federal credit unions under specified conditions 12 U.S.C. §1770; Rural Development act of 1972, as amended 7 U.S.C. §2204b-1, Requires federal agencies to give first priority to rural areas in locating

offices and other facilities. Executive Order 12941, Federal owned buildings safety standards. Executive Order 13045, Protection Children from Health and Safety Risks. Federal Management Regulation, Subchapter C-Real Property, part 102-74, Facility Management (41 C.F.R. part 102-74) Prescribed policy guidance for the management, operation, and maintenance of Federal Government owned and leased properties. Federal Management Regulation, Subchapter C-Real Property, part 102-80, Safety and Environmental Management (41 C.F.R. part 102-80) Prescribed safety and environmental management policy.

32. Evidence trespass to land disposition trash and or large animal possible dog waste being purposefully intent deposit-to-display to the "Drake-Study" attachment flowerbed-yard-sidewalk by repeat-to-relapses persist multiple occasions specifically pee in concentration toxic including but not limiting ammonium salts impenetrable tree roots and exterior cambium tissue vital substance by oozing bacterial disease which eventually destroying and or evidently impaired the infecting tree growth.

33. Reisolate the above and or reconsolidate paragraph#22 through paragraph#26 naming fact, that evidence trespass to land disposition trash and its enlarged animal or dog waste being repeat-to-relapses intent deposit-to-display to the "Drake-Study" flowerbed-yard-sidewalk maybe pattern progressive-to-aggravated retaliation, intimidation, threat with intent to impair allege notified United States proceeding by means damaging or threatening to damage a real property and or the "Drake-Study".

(J). COLLECTION UNLAWFUL DEBT

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34. On 10-06-2017 and 10-19-2017, the alleged "Morgan Crossing Owners Association" and of its alleged associate or agent "Assured Management, Inc." whom having devised or intending to utilizing the United States mails to false accuse-by-misrepresentation plaintiffs "Drake-Study" trees-plants-shrubs be waste trash subjective demanding timely removal and replacement expense incurred usurious by attempting enforcement restrictive property deed without due process State or Federal law (See, e.g., ATTACHMENT-5, EXHIBIT-MORGAN CROSSING-001, 10-06-2017; Noticeof Violation dated also, EXHIBIT-MORGAN CROSSING-002, Notice of Violation dated 10-19-2017, Morgan Crossing Owners Association).

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35. Consolidate aforementioned paragraphs entirely, that the alleged "Morgan Crossing Owners Association" and of its alleged associate whom having devised or intending false accuse-by-misrepresentation plaintiffs "Drake-Study" trees-plants-shrubs might been diseased, dying, or dead which had been direct result connect in corruptions: First(1) alleged "City-of-Allen" delay-to-denial and or fraudulent provide absolute none existed trash and or collectively its public service; Second(2) instigate by neglect standard care to allowance subjective repeat-to-relapses interference accessing-to-caring enjoyment property and by association Third(3) nonpoint source pollutant trespass to land disposition trash and of its enlarged animal or dog waste deposit-to-display to impairing growth and or killing "Drake-Study" trees-plants-shrubs in progress alleged,

1 II. DEFENDANTS 2 3 36. DEFENDANT#1, the "City-of-Allen" is municipal 4 corporation collectively administrative by its group 5 municipal officers. 6 7 37. DEFENDANT#3, the "DataProse" is a private limited 8 liability company "City-of-Allen" contracted its associate or 9 third party seller for post-transaction online billings 10 statement, that is collectively including but not limiting its officers, directors, and employees, franchisee owner 11 12 operators and or successors therewith; 13 14 38. DEFENDANT#5, the "Collin County" is administrative 15 or political subdivision of state Texas, which region having specific boundaries and governmental authority that 16 17 embodies the "City-of-Allen". 18 19 39. DEFENDANT#7, "Morgan Crossing Owners Association" 20 is a private association formed by real estate developer 21 managing its residential subdivision. 22 23 40. DEFENDANT#9, "Assured Management, Inc." a private 24 corporation is authorized agent by "Morgan Crossing 25 Owners Association" managing its residential subdivision. 26 27 41. DEFENDANT#11, "Anonymous" is any culpable person 28 or entity organized actual-or-superficial, whom may be 29 singular-or-plural associate enterprise engaged activities 30 directly-and-indirectly that affect any harm damaging the 31 real property "Drake-Study" allocation this complaint;

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III. VENUE & JURISDICTION

42. United States Constitution ART. II, (4); IV, (4);

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43. Congress enact statutes codified in Title 18 provides Federal Prosecution of Public Corruption pursuant the Hobbs Act (enacted 1934), the mail and wire fraud statutes (enacted 1872), including but not limiting the honest services fraud provision, the Travel Act (enacted 1961) and the Racketeer Influenced and Corrupt Organization Act (RICO enacted 1970) and the Foreign Corrupt Practices (FCPA enacted 1977) which authority ensured the public service government obligation of the United States said liable:

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COUNT-1

44. Reallege paragraph#3 through #35, that CERCLA holds potentially reasonable parties (PRPs) DEFENDANT#1, #5, #7, #9, #11 joint and severally liable, without regard to fault, for cleanup costs damage incurred in response to the release or threatened release of hazardous substances as nonpoint source pollutant trespass to land disposition trash and of its enlarged animal or dog waste deposit-to-display to impairing growth and or killing "Drake-Study" trees-plants-shrubs in progress, which authorization is pursuant CERLA §107. Punitive damage equals to or up to three(3) times assessment that of DEFENDANT#7, #9 attempting to collect in usurious by attempting enforcement restrictive property deed equal to DEFENDANT#5 appraisal amount.

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COUNT-2

45. Reallege paragraph#27 through #29, that DEFENDANT#1, #5, #7, #9, #11 each in singular is severally liable of offenses physical endangerment to children, it is violation 18 U.S.C. §3283.

COUNT-3

46. Reallege paragraph#22 through #26, that DEFENDANT#1, #5, #7, #9, #11 each in singular is severally liable hinder-to-delay by meanings obstruct United States each proceeding before Congress, the Court and its district court legal process is violation 18 U.S.C. \$1512(b) outlined intimidation, threats, persuasion to obstruction shall be fined \$250,000.

COUNT-4

47. Reconsolidate COUNT-1-2-3, that DEFENDANT#1, #5, #7, #9, #11 each in singular knowing engagement in conduct; either causing, or threatening to cause bodily injury; with intent to retaliate the known United States proceeding, it is violation 18 U.S.C. §1513 fine is \$250,000.

COUNT-5

48. Reallege paragraph#16 through #21, that DEFENDANT#5 demanding a certain amount by hint "additional information" which is other than Texas Property Tax Code Sec.11.13 requirement, this is extortion under color official right specifically 18 U.S.C. § 1951 prohibited and shall be fined \$250,000.

COUNT-6

49. Reallege paragraph#13 through #18, that DEFENDANT#1, #5, #7, #9, #11 whom each is severally liable attempts to interfere, obstruct and impede with administration of Social Security Act of 42 U.S.C. \$1320a-8b prescribed and prohibited corruption.

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COUNT-7

50. Reclaim upon COUNT-5 alleged, that DEFENDANT#5, denial "Drake-Study" rightful application of its homestead, specifically on the evidence state of mind misrepresentation Texas Property Code, Section 11.45(b) knowingly intentionally recklessly by neglecting portion its statute "However, for good cause shown the chief appraiser may extend the deadline", whom attempting deprivation Social Security Recipients of right under color of law is violation 18 U.S.C. § 242 shall be fined \$100,000.

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COUNT-8

51. Reallege paragraph#3 #18, through that DEFENDANT#1, #3, #5, #7, #9 each is severally liable public corruption whom have devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or anything represented to be or intimated or held out to be such counterfeit or spurious of public service, executing such scheme or artifice or attempting so to do, places in or been sent or delivered by the United States Postal Service is violation 18 U.S.C. §1341 shall be fined nothing less than \$1,000,000.

COUNT-9

52. Reallege paragraph#3 through #18, that DEFENDANT#1, #3 each is severally liable public corruption, whom have devised or intending to devise any scheme or artifice to defraud, and for obtaining money or property by means of false or fraudulent pretense, representations as public service, or promises, transmits or cause be transmitted by means of internet is violation 18 U.S.C. §1343 shall be fined nothing less than \$1,000,000.

COUNT-10

53. Reconsolidate COUNT-1-2-3-4-5-6-7-8-9 federal offense of title-18 continue pattern the racketeering activity meaning defined by 18 U.S.C. § 1962(b), that DEFENDANT#1, #3, #5, #7, #9, #11 each is severally liable engagement by participation its enterprise affair unlawful collection of debt in the usurious or in the name of public service is 18 U.S.C. §1962(b) prohibited and shall be fined nothing less \$250,000.

COUNT-11

54. Reconsolidate COUNT-1 through COUNT-10 federal offense of title-18 continue pattern the racketeering activity meaning defined by 18 U.S.C. § 1961(1), that DEFENDANT#1, #3, #5, #7, #9, #11 each is severally liable engagement by participation its enterprise affair through the naming racketeering activity proceed to damage real property plaintiffs "*Drake-Study*", whom is liable violation of 18 U.S.C. §1963 and shall be fined nothing less \$250,000.

IV. TREBLE RELIEF

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55. Reallege COUNT-1 through COUNT-11, that 18 U.S.C. §1964 (c) Civil remedies United States officers injured property plaintiffs "Drake-Study" threefold damage each count sustain recovered, replacement all cost of the suit, including reasonable attorneys fee may deem appropriate this district court.

COUNT-12

56. Reconsolidate COUNT-1 through COUNT-10, that DEFENDANT#11 is severally liable knowingly transports or cause to be transport any hazardous waste specify trespass to land disposition trash and its enlarged animal or dog waste being purposefully intent deposit-to-display to the "Drake-Study" flowerbed, front yard and sidewalk purposefully destroying and or impaired the infecting its tree growth, whom is violation SWDA §3008, and or 42 U.S.C. §6928 (e) shall be fined \$250,000 and that naming DEFENDANT#1, #5, #7, #9, #11 said enterprise or each organization intent to neglect maintaining DNA record of dog registration by failure to excise mandate standard of care to refusing, delay to denial tracing identify waste release point, shall be fined nothing less than \$1,000,000.

V. JOINDER NOMINAL DEFENDANTS 1 2 3 58. United States will file its Joinder of Person Needed for Just Adjudication pursuant FRCP Rules, Rule 19(a)(1) at early 4 5 date in sequent upon the court grant movant application 6 by issuing subpoena defense production in matter 7 supportive proceeding vindicate public interest. 8 9 VI. CONCLUSION 10 11 United States reclaim all from the above applicable 12 plaintiffs relief with equity that is justly entitled 13 14 Respectfully Submitted, 15 16 17 18 19 20 Hao Liu for the United States, dated 12/18/2017 21 22 Mr. Hao Liu 23 1811 Drake Dr. 24 Allen, Texas 75002 25 26 Mr. David A O'Neil 27 Assistant Attorney General 28 U.S. Department of Justice 29 Criminal Division 30 950 Pennsylvania Ave, NW

31

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